



ORDOT LANDFILL SUPERFUND SITE VILLAGES OF ORDOT AND CHALAN PAGO, GUAM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

SAN FRANCISCO, CA

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SECOND FIVE-YEAR REVIEW COMPLETE

The United States Environmental Protection Agency (USEPA) announces completion of a second five-year review for the Ordot Landfill Superfund site located near the villages of Ordot and Chalan Pago in Guam, a U.S. territory. This review was conducted between June and September 2002. This fact sheet presents site background, the five-year review process, the review findings, conclusions and recommendations and contact information.

Site Background

A second five-year review of the Ordot Landfill Superfund Site in the Territory of Guam was completed in September 2002. The five-year review documents the evaluation of whether the September 1988 no action Record of Decision (ROD) remains protective of human health and the environment. The triggering action for the review was the previous five-year review for this site, conducted in September 1993.

The September 1988 ROD for the site prescribed not to take action under the Comprehensive Environmental Response, Compensation, and Liability Act as Amended (also known as CERCLA or Superfund), but to defer cleanup of the site to the Clean Water Act (CWA) program. The determination was based primarily on the fact that the site is still an operating municipal landfill and that data, although too limited for comprehensive conclusions, had not demonstrated any imminent and substantial endangerment to human health or welfare or the environment.

On March 26, 1986, the United States Environmental Protection Agency issued an Administrative Order under the Clean Water Act, 33 USC Section 1251 et seq., that required the Guam Department of Public Works (DPW) to cease discharge of leachate from the site to the Lonfit River.

The previous five-year review for the site conducted in 1993 did not indicate any apparent areas of noncompliance with regard to the no action ROD; however, the extent of compliance achieved by the Guam DPW in response to the CWA Administrative Order was not evaluated. Due to the failure of the Guam DPW to comply with the Administrative Order, the United States Department of Justice (DOJ), acting on behalf of USEPA, filed a lawsuit on August 7, 2002 to force the closure of the landfill.

Five-Year Review Process

From April 24, 2002 to August 15, 2002, the following components of the Five-year Review Process were performed:

- Community Outreach Efforts
- Document Review
- Data Review
- Site Inspection
- Local (and other) Interviews

Community Involvement

Copies of a fact sheet describing the five-year review process were distributed locally during the site visit in the week of June 24, 2002.

Document Review

As a part of the five-year review process, a brief review of numerous documents related to site activities was conducted. The documents chosen for review primarily focused on issues that have occurred during the past 9 years, but ranged in publication date from 1983 to the present.

Data Review

Contaminant conditions at the site, based on historical leachate, surface water, groundwater, and sediment sampling events conducted since 1980 were reviewed. Current analytical data trends were compared to analytical data collected since the last five-year review (September 1993).

Site Inspection

Representatives of USEPA, Guam DPW, and CH2M HILL (subcontractor to USEPA) took part in a site inspection on June 25, 2002. The purpose of the inspection was to assess the protectiveness of the no action ROD and to evaluate conditions of the site with respect to compliance with the CWA Administrative Order.

Community Interviews

Four residents from the local community of Ordot/Chalan Pago were interviewed regarding their knowledge of, or concerns about, historical and current site operations and management practices.

Technical Interviews

Individuals were interviewed regarding their knowledge of, or concerns about, technical aspects of the 1988 no-action ROD and about issues related to current operation and maintenance of the landfill.

Five-Year Review Results

Due to the fact that Guam DPW has not complied with the CWA Administrative Order and that leachate from the site continues to be discharged into the Lonfit River, it appears that the no action ROD is not functioning as intended.

Therefore, the no action remedy decision per the 1988 Record of Decision (ROD) was found not protective of human health and the environment. The Department of Justice, on behalf of USEPA, has filed a complaint against the Government of Guam seeking both civil penalties and injunctive relief for Guam's violations of the CWA. DOJ has requested the Court to order Guam to cease all unpermitted discharges and to comply with the Clean Water Act. Given that the basis of the requested remedy is that actions will be taken to address operational problems at the landfill under the CWA, EPA will be able to evaluate whether additional remedial actions are necessary after the Government of Guam implements the measures sought in this enforcement action.

Conclusions and Recommendations

Proper landfill operation procedures at the site, including the placement of daily cover material and proper waste compaction, have not been conducted at the site. To date, several operations plans have been prepared for the site but none has been implemented. The landfill has produced leachate which has been discharging into the Lonfit River. The landfill is impacting the water quality of the Lonfit River. There have been fires at the dump which have required the temporary evacuation of nearby homes. EPA has concerns about the dangers from above-ground and underground fires, including accumulation of carbon monoxide in nearby lower elevations. Since 1986, the EPA has attempted to get Guam to address the problems at the dump through negotiations and then by issuing administrative orders and filing administrative

complaints. Those efforts have failed to stop the illegal discharges to the Lonfit River, because Guam has failed to comply with the orders and its agreements. On August 7, 2002, DOJ, on behalf of USEPA, filed a complaint against the Government of Guam seeking both civil penalties and injunctive relief for Guam's violations of the CWA. DOJ has requested the Court to order Guam to cease all non-permitted discharge and to comply with the CWA. The resounding opinion of the local community members and technical personnel interviewed during the five-year review was also that the landfill should be closed.

Dependent upon the actions implemented pursuant to the CWA enforcement action and as part of the formal closure process, a complete site characterization and formal ecological and human health risk assessments are recommended to evaluate current risks at the site. Future sampling efforts for collecting additional analytical data should be conducted with the appropriate field and laboratory quality assurance and quality control measures to provide useable data for ecological and human health risk evaluation purposes. Media sampled during future risk assessment efforts would include groundwater, surface water, sediment, soil, aquatic biota tissue, and terrestrial biota tissue.

Site Information

Please visit the EPA Region 9 web page <http://yosemite.epa.gov/r9/sfund/overview.nsf>, then click on Ordot Landfill

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